

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and INVESTORS)	
PARTNER LIFE INSURANCE)	
COMPANY,)	
)	
Plaintiffs,)	CIVIL ACTION NO. 03-12501-DPW
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	
_____)	

**PLAINTIFFS' MOTION FOR
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "John Hancock") hereby move this Court for leave to file the following document under Seal:

1. Plaintiffs' Reply Brief In Support of Their Motion To Compel.

The material to be impounded contains confidential information of Abbott Laboratories ("Abbott") and/or John Hancock and has been designated "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004 ("Stipulated Protective Order").

John Hancock has consulted with Abbott pursuant to Local Rule 7.1(A)(2), and Abbott concurs that John Hancock's Reply Brief should be filed in compliance with the provisions of the Stipulated Protective Order and Local Rule 7.2.

John Hancock respectfully requests that the Confidential Information that is the subject of this Reply Brief be impounded until further Order of the Court.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE LIFE
INSURANCE COMPANY, AND INVESTORS
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Karen Collari Troake

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Dated: August 20, 2004.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company has conferred with Abbott Laboratories' counsel and that Abbott Laboratories has no objection to impoundment of the materials, to the extent that they are filed in connection with Plaintiffs' Reply Brief.

/s/ Karen Collari Troake
Karen Collari Troake